

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

EMANUEL JONES

Plaintiff

v.

OFFICER NORRIS and NEW CASTLE
COUNTY POLICE DEPARTMENT,
Defendants,

06-674 (CSR)

C.A. No. 06-674 (CSR)

FILED

AUG - 7 2007

U.S. DISTRICT COURT
DISTRICT OF DELAWARE

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PLAINTIFF'S SECOND REQUEST FOR PRODUCTION
DIRECTED TO DEFENDANTS

Pursuant to the Federal Rules of Civil Procedure, Plaintiff hereby request that the defendant produce the following documents of recorded information included but not limited to writings, drawings, graphs, charts, photographs, audio-recordings, tapes, computer printouts, and other data compilations from which data or information can be obtained and translated, if necessary, into reasonably useable form.

IF any document required to be produced by this request is claimed by you to be not discoverable because it is privileged or for any other reason, then each such document should be identified in your response by date, sender, recipient, persons to whom copies have been furnished, and subject matter, and the basis for the claim of privilege or other reason should be stated in your response.

Please produce the following:

1. New Caslte County Police Departmental Policies on the use of force only when necessary to effect a lawful objective, according to 11 Del C § 467.
2. Copies of Injury reports.
3. Incident report, policies on the use of force with a stun device. Policies and the instruction pertinent to those policies (C.A.L.E.A. Standards 1.3.1 through 1.3.5).
4. All written recorded statements, description of statements, summaries of statements, memoranda (signed or unsigned), of any witness or any party identified herein, during the criminal charges, including tapes or other mechanically transcribed information.
5. Any and all documents containing the names and home addresses of all individuals contacted as potential witnesses.
6. Directive on Stun devices to assist in making a lawful arrest when resistance is encountered.
7. All photographs, recordings, films, charts, sketches, graphs and diagrams taken and/or prepared.

8. All writings, memoranda, date and / or tangible things which relate directly or indirectly to the incident and writings set forth to review by the Professional Standards Unit.

9. All photographs, diagrams, drawings, reports, statements, and each and every item given to or examined by experts or consultants.

Emmanuel H. Jones #557338
Plummer Community Corrections
38 Tedds Lane
Wilmington, DE 19802-3210

DATED: 08/04/07

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FOR THE DISTRICT OF DELAWARE

EMANUEL JONES

Plaintiff

vs

C.A. No. 06-674 SLR

OFFICER NORRIS and NEW CASTLE
COUNTY POLICE DEPARTMENT,
Defendants.

CERTIFICATE OF SERVICE

I, Emanuel Jones, Plaintiff hereby certify that on the day of July 2007, two copies of the Plaintiffs' Second Request for Discovery were served by U.S. Mail to the following:

NEW CASTLE COUNTY OFFICE OF LAW
Julie M. Sebring Esq. - DE ID #2259
Assistant County Attorney
87 Read's Way
New Castle, DE 19720
Attorney for Defendant New
castle County Police Department

OFFICE OF the Clerk
United States District Court
844 N. King St. Lock Box 18
Wilmington, Delaware 19801
3570

DATED 08/04/07